



U.S. Pipelines and Logistics

BP Pipelines (North America) Inc.
28100 Torch Parkway
Warrenville, Illinois 60555

April 8, 2010

Ms. Linda Daugherty
Director, Southern Region
U.S. Department of Transportation
Pipeline and Hazardous Materials Safety Administration
233 Peachtree Street, Suite 600
Atlanta, GA 30303

RE: CPF 2-2010-1003W
Destin Pipeline Company, LLC
Operator ID #31088

Dear Ms. Daugherty:

BP Pipelines (North America), Inc., operator for Destin Pipeline, acknowledges receipt of your CPF-2-2010-1003W warning letter. BP would like to respond for the record on this warning since several of these items were documented as corrected either prior to the inspection or shortly thereafter. Also, in our response, we are providing a clarification pertaining to item No.3, regarding a pressure regulating control valve, PV-1400, which regulates a low pressure secondary fuel gas supply line to a main compressor. The fuel gas supply system is not part of the gas transmission or transportation system.

BP Pipelines submits the attached additional information in response to the issues raised in the warning letter. Also included is the drawing Pascagoula Compressor Station Fuel Gas Heater/Filter Separator Mechanical Flow Sheet Drawing Number DES-C1-A-104 which relates to Item No.3. It is our belief that these responses address PHMSA's concerns as described in CPF 2-2010-1003W.

If you have any questions pertaining to this matter, please contact Rob Knanishu at (630) 836-3498.

Sincerely,

David O. Barnes, P.E.
Manager DOT & Integrity

Enclosures

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CPF 2-2010-1003W
Destin Pipeline Company, LLC
Operator ID #31088

Item #1) 192.491 Corrosion Control Records & 192.459 External Corrosion Control

The documentation alleged to be deficient pertained to a 2008 examination of exposed pipe. Destin Pipeline has taken steps to enhance employee awareness when completing Repair and Inspection Reports, ensuring that the forms are accurately completed. Procedures and specifications are in place to provide guidance when gathering and completing the appropriate documentation and the importance of this documentation has been reinforced with employees to prevent a reoccurrence of this issue.

Item #2) 192.709 Recordkeeping & 192.731 Inspection & testing of relief devices

The missing documentation pertained to a 2005 test. All documentation since the 2005 inspection was provided during the records review portion of this audit, as Destin Pipeline had reviewed its covered devices and updated its Maximo database to incorporate inspections of the referenced device after 2005.

Item #3) 192.709 Recordkeeping and 192.739 Inspection & testing of pressure-limiting and regulating stations

In consideration of PHMSA's 192.3 definitions for "Pipeline" and "Pipeline facility" Destin does not consider a "turbine fuel gas heater/filter separator" a jurisdictional device and therefore does not consider the pressure regulating control valve (PV-1400) servicing the fuel gas heater/filter separator a jurisdictional device. This device is located on the backup fuel gas line to the turbine that drives the compressor, downstream of the fuel gas heater. This device does not provide over-pressure protection for the transmission pipeline but rather steps down the pressure in the fuel gas line providing a steady feed into a volume/pulsation vessel prior to introduction into the gas turbine driver. See the enclosed drawing Pascagoula Compressor Station Fuel Gas Heater/Filter Separator Mechanical Flow Sheet Drawing Number DES-C1-A-104.

Item #4) 479 Atmospheric Corrosion Control - General

The atmospheric corrosion noted during the inspection has since been addressed as part of Destin's normal corrosion control program. Atmospheric corrosion inspections are conducted on 3-year intervals. The light surface oxide was addressed promptly following the inspection and did not affect the safe operation of the pipeline prior to the next scheduled inspection.

